

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAIMEY GARRETT, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THE CJS SOLUTIONS GROUP, LLC
d/b/a THE HCI GROUP,

Defendant.

Case No. 2:17-cv-00863-RSM

STIPULATED MOTION AND ORDER
FOR EXTENSION OF TIME FOR HCI TO
ANSWER OR OTHERWISE RESPOND TO
THE COMPLAINT

Defendant The CJS Solutions Group, LLC d/b/a The HCI Group (“HCI”) hereby moves, with Plaintiff Jaimey Garrett’s assent, for a thirty-day extension of the time in which to answer, move, or otherwise respond to Plaintiff’s Complaint, through and including July 12, 2017. In support of this assented-to motion, HCI states the following:

1. Garrett commenced this action in Washington Superior Court for King County, captioned *Jaimey Garrett v. The CJS Solutions Group, LLC d/b/a The HCI Group*, Case No. 17-2-10799-9 SEA, on or about April 26, 2017.

2. On or about May 4, 2017, Garrett served the Complaint on HCI.

3. On June 5, 2017, HCI removed the action to this Court.

4. The current deadline for HCI’s responsive pleading is June 12, 2017.

STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME FOR
HCI TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT -

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(Case 2:17-cv-00863-RSM)

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1 5. HCI seeks a 30-day extension of this deadline to allow it to more fully
2 investigate the facts alleged in the Complaint, as HCI's counsel was only recently retained.

3 6. On June 7, 2017, Garrett's counsel, Harold Lichten, assented to HCI's
4 request for a 30-day extension of time in which to respond to the Complaint.

5 7. This motion is filed before the response to the Complaint is due and is
6 filed in good faith and not for the purpose of unwarranted delay.

7 8. This motion constitutes HCI's first request for an extension of its
8 responsive pleading deadline in this action.

9 9. This motion does not constitute a waiver of any defense that HCI may
10 assert in response to Garrett's Complaint.

11 For the above reasons, HCI respectfully requests that the Court grant this
12 stipulated motion for an extension of time to answer, move or otherwise respond to Garrett's
13 Complaint in this action, through and including July 12, 2017.

14 DATED this 9th day of June, 2017.

16 /s/ Beth E. Terrell

17 /s/ Jennifer Rust Murray

18 Beth E. Terrell

18 Jennifer Rust Murray

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22 Attorneys for Plaintiff Jaimey Garrett

/s/ Susan K. Stahlfeld

/s/ Francis L. Van Dusen, Jr.

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1 **ORDER**

2 Upon consideration of the Stipulation of the Parties Extending Time to Respond
3 to Complaint, good cause having been shown, it is hereby

4 ORDERED that the Stipulation is approved and that the Defendant HCI may have
5 until July 12, 2017, to respond to the Complaint.

6 Dated this 12 day of June, 2017.

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9 RICARDO S. MARTINEZ
10 CHIEF UNITED STATES DISTRICT JUDGE
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